

Honorable John C. Coughenour

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER J. NEAL,

Defendants.

) No. CR06-0107JCC

)
) STIPULATED MOTION AND ORDER
) CONTINUING TRIAL DATE AND
) PRETRIAL MOTIONS CUTOFF

STIPULATION

The United States, by and through John Lulejian, Assistant United States Attorney, and defendant Christopher J. Neal, by and through his attorney, Anna M. Tolin, hereby stipulate and agree that good cause exists to continue trial in this case for approximately 60 days from May 30, 2006 to July 24, 2006, and to extend the pretrial motions date cutoff to June 29, 2006.

The parties agree that this continuance is necessary for the reasons below. The discovery process is not yet complete. This case is based upon evidence and

STIPULATED MOTION AND ORDER
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PRETRIAL MOTION CUTOFF
Page 1 of 4
CR06-0107JCC (Neal)

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1 allegations primarily developed by local law enforcement officers, and additional time is
2 needed to complete discovery and allow the defense to investigate and analyze the
3 evidence in this case. Both sides require additional time to research and analyze
4 multiple legal issues as well as to explore possible agreements to resolve this matter
5 prior to trial. The defendant has consented to this continuance, and a waiver of speedy
6 trial will be filed with the Court.

7 The parties agree that the requested continuance is necessary to avoid a
8 miscarriage of justice and to ensure the effective assistance of counsel.

9 Respectfully submitted this 28th day of April, 2006.

10
11 /s/
John Lulejian
12 Assistant United States Attorney
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13 Seattle, WA 98101
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14 john.lulejian@usdoj.gov

15
16 /s/
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17 Attorney for Christopher Neal
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ORDER

Based upon the foregoing stipulation of the parties, and upon all of the papers and proceedings previously filed herein, the Court hereby finds that good cause exists to extend the trial date from May 30, 2006 until July 24, 2006 and to extend the pretrial motions cutoff to June 29, 2006.

The Court further finds that after considering the interests of the defendant and the public in a speedy trial, failure to grant the requested continuance would likely result in a miscarriage of justice and deny the parties the reasonable time necessary for effective presentation, taking into account the exercise of due diligence

SO ORDERED.

DATED this 3rd day of May, 2006.



JOHN C. COUGHENOUR
UNITED STATES DISTRICT JUDGE

Presented by:

/s/

John Lulejian
Assistant United States Attorney

/s/

Anna M. Tolin, WSBA #22071
Attorney for Christopher Neal